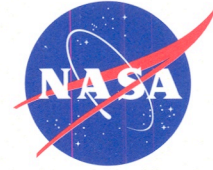


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



October 27, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the Space Transportation Association Breakfast on November 3, 2011

On November 3, 2011, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue code, will host a Breakfast at 7:30 a.m. – 9:00 a.m., at 253 Russell Senate Office Building in Washington, D.C. The breakfast will feature Bob Cabana, Director of NASA Kennedy Space Center. Mr. Cabana will provide an update on the Kennedy Space Center. Co-sponsors of the event include Aerojet, ATK, Ball Aerospace, Dynetics, Honeywell, ITT, Lockheed Martin, Orbital, Paragon, United Launch Alliance, United Space Alliance, and Wyle. STA is sending out all the invitations and arranging the seating for the attendees.

Approximately 300 people will attend the breakfast, including representatives of Congress, the White House, industry representatives, the media and Federal Agencies such as NASA, DoD, and FAA. The estimated cost of the breakfast, including all food and beverages, is \$25.00 per person. I find that the event meets the requirements of a “widely attended gathering” as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. The breakfast will give NASA attendees the opportunity to discuss U.S. space policy and NASA’s programs. Accordingly, NASA employees whose duties do not substantially affect the sponsors, including NASA employees in non-career positions subject to the Ethics Pledge required by Executive Order 13490, may accept an invitation for free attendance to the breakfast.

However, NASA employees whose duties may substantially affect the sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone